

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

INTERMARINE, LLC,	§	
	§	
Plaintiff	§	
	§	
v.	§	C.A. NO. 4:14-cv-00145
	§	
SPLIETHOFF BEVRACHTINGSKANTOOR	§	
B.V., SPLIETHOFF AMERICAS, INC., and	§	
KASPER BIHLET,	§	
	§	
Defendants	§	

UNOPPOSED MOTION FOR ENTRY OF ORDER ON DOCUMENT PRODUCTION

TO THE HONORABLE JUDGE OF SAID COURT:

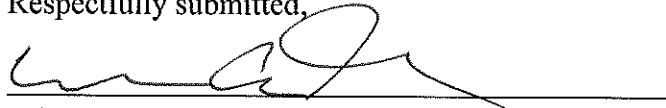
NOW COMES Spliethoff's Bevrachtingskatoor B.V. and Spliethoff Americas, Inc. and respectfully requests the Court to enter the attached Unopposed Order for the Production of Documents by Spliethoff's Bevrachtingskatoor B.V. and Spliethoff Americas, Inc. and in support thereof would respectfully show as follows:

1. Spliethoff, in attempting to respond to the Plaintiff Intermarine, LLC's request as directed by the Court at the hearing on September 26, 2014, has proceeded with searching for the responsive documents. Due to the Plaintiff's request and the voluminous production, the production cannot be accomplished within 7 days or 14 days as indicated by the Court. Accordingly, the parties have conferred and the Spliethoff Defendants have proposed a schedule for production to which Plaintiff Intermarine is unopposed.
2. The production of documents will be from the active emails of the Spliethoff Defendants by October 24, 2014 and subsequently production of archived emails by October 31, 2014.

It is respectfully requested that the Court enter the attached Unopposed Order reflecting this scheduling.

WHEREFORE, PREMISES CONSIDERED, Spliethoff's Bevrachtingskatoor B.V. and Spliethoff Americas, Inc. respectfully request that the Court enter an Order providing for the production of documents with the schedule attached hereto and for such other and further relief in law and equity as it may show itself to be justly entitled.

Respectfully submitted,



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Inc. and Spliethoff's Bevrachtingskatoor B.V.*

OF COUNSEL:

EASTHAM, WATSON, DALE & FORNEY, L.L.P.

CERTIFICATE OF OPPOSITION

The relief sought by providing a draft copy of the attached Order was provided to counsel who advised they did not oppose the entry of the Order.



William A. Durham

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I forwarded a true and correct copy of the foregoing Unopposed Motion for Entry of Order on Document Production to the following counsel of record on this the 21st day of October, 2014.

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